

PROSKAUER ROSE LLP  
Dale A. Schreiber (DS-9211)  
Colin A. Underwood (CU-3445)  
Seth B. Schafler (SS-5993)  
1585 Broadway  
New York, NY 10036-8299  
(212) 969-3000  
(212) 969-2900 (fax)

Attorneys for Defendant Keystone Shipping Co.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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AMERICAN STEAMSHIP OWNERS MUTUAL : Civil Action No. 04-CV-4309 (LAK)  
PROTECTION AND INDEMNITY  
ASSOCIATION, INC., : **(ECF CASE)**

Plaintiff, :

v. :

ALCOA STEAMSHIP CO., INC., et al., : **STATEMENT PURSUANT**  
 : **TO RULE 7.1**  
Defendants. :

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Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, and to enable judges and magistrates of the Court to evaluate possible disqualification and recusal, the undersigned counsel of record for named Defendant Keystone Shipping Co. and other entities named under Keystone Shipping Co. on Ex. A to the Second Amended Complaint, dated July 8, 2004, certifies that:

(1) named Defendant Chas. Kurz & Co., Inc. wholly owns and is the parent company of named Defendants Keystone Shipping Co., Baldbutte Shipping Company, Chestnut Shipping Company, Chilbar Shipping Company, Fredericksburg Shipping Company, and Margate Shipping Company;

(2) named Defendant Keystone Tankship Corporation is owned by certain individuals;

(3) named Defendant Timbo Shipping Ltd., was owned by certain individuals and has been duly dissolved;

(4) named Defendant Calendar Navigation Corporation was wholly owned by named Defendant Chas. Kurz & Co. and has been duly dissolved;

(5) named Defendant New England Collier Company was a joint venture that was managed by Keystone Shipping Co. and has been duly dissolved;

(6) named Defendant Paco Tankers, Inc. was at one time managed by Keystone Shipping Co., but was not and is not now controlled by or related to any Keystone entity and is no longer managed by Keystone Shipping Co.; and

(7) no publicly-held corporation owns ten percent (10%) or more of the stock of Chas. Kurz & Co., Inc. and it has no parent corporation.

Dated: New York, New York  
October 8, 2004

PROSKAUER ROSE LLP

By: /s/ Dale A. Schreiber  
Dale A. Schreiber (DS-9211)  
1585 Broadway  
New York, New York 10036-8229  
(212) 969-3000  
(212) 969-2900 (fax)  
Attorneys for Defendant Keystone  
Shipping Co.